

**COMMONWEALTH OF MASSACHUSETTS
BEFORE THE
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

Bay State Gas Company

)
D.T.E. 05-27
)

**PETITION TO INTERVENE
ON BEHALF OF
ASSOCIATED INDUSTRIES OF MASSACHUSETTS**

Associated Industries of Massachusetts (A.I.M.) hereby petitions for leave to intervene and participate in the above captioned proceeding.

In support of its request, A.I.M. states the following:

1. Petitioner is an organization of Massachusetts companies representing more than 7,600 employers in both the manufacturing and non-manufacturing sectors in the Commonwealth. A.I.M. was founded in 1915 and has since sought to advocate positive public policy decisions to promote a vibrant and expanding economy, and retain and expand job opportunities in Massachusetts.
2. In conducting adjudicatory hearings, the Department may “allow any person showing that he may substantially and specifically be affected by the proceeding, and allow any other interested person to participate by presentation of argument orally or in writing, or for any limited purpose” as the Department may order. *See* G.L. c. 30A section 10, cl. (4); *see, also*, 220 CMR 1.036(1)(b). A.I.M. has participated in similar D.T.E. proceedings.
3. Petitioner is responsible for representing the interests of its commercial and industrial members across the Commonwealth in various forums. A.I.M. members in the Bay State Gas distribution territory will be substantially affected by the increase proposed in this price cap performance-based rate plan where the Company proposes to adjust its rates annually for five years.

4. A.I.M. represents specific classes of ratepayers and is qualified to represent their interests and determine if, as customer class, they will be harmed by proposed cost allocation or other proposed changes in this case.
5. A.I.M. requests that all notices, testimony, pleadings and correspondence pertaining to these proceedings be directed to:

Angela M. O'Connor
Vice President - Energy Policy
Associated Industries of Massachusetts
222 Berkeley Street, 13th Floor
Boston, MA 02117-0763

Therefore, A.I.M. respectfully requests the right to participate in this proceeding as a full intervener.

RESPECTFULLY SUBMITTED

By: _____
Robert R. Ruddock
General Counsel
Associated Industries of Massachusetts
222 Berkeley Street, 13th Floor
Boston, MA 02117-0763

Date: May 13, 2005